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Attorneys for Defendants EQUIFAX
INFORMATION SERVICES LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

NOEMIA CARVALHO, on behalf of herself)
and other similarly situated people,)

Plaintiff,)

v.)

CREDIT CONSULTING SERVICES, INC.,)
dba CCS, EQUIFAX CREDIT)
INFORMATION SERVICES, LLC,)
EXPERIAN INFORMATION SOLUTIONS,)
INC., TRANS UNION LLC and DOES 1-50,)
inclusive,)

Defendants.)

Case No. 5:08-CV-01317-JF

**MOTION FOR EXTENSION OF TIME
FOR DEFENDANT EQUIFAX
INFORMATION SERVICES LLC TO FILE
ITS RESPONSE TO PLAINTIFF'S
MOTION TO REMAND**

Hearing: June 20, 2008
Time: 9:00 a.m.
Judge: Jeremy Fogel
Courtroom 3, 5th Floor
San Jose, California

COMES NOW Defendant Equifax Information Services LLC ("Equifax"), and pursuant to Local Rule 6-3, hereby requests an extension of time for Equifax to file its response to Plaintiff's Motion to Remand as follows:

1. Plaintiff's Motion is scheduled for a hearing on June 20, 2008. Pursuant to Local Rule 7-3, Equifax's opposition to the motion must be served and filed not less than 21 days before the hearing, on May 30, 2008.

2. Equifax's attorney, Barry Goheen (Application for Admission *Pro Hac Vice* recently filed) has taken the lead in preparing the response and plans to attend the hearing on the

1 motion on June 20. Unfortunately, Mr. Goheen's mother is seriously ill and he has had to leave
2 town to be with her, so that he is unable to complete the response for filing tomorrow.

3 3. Because of this hardship, Equifax requests an extension of time for Equifax to file
4 its response to June 6, 2008.

5 4. No other extensions have been requested in this matter and this extension will not
6 effect the hearing date.

7 5. Equifax attempted to obtain Plaintiff's consent to this extension by telephone and
8 multiple emails earlier today. However, Plaintiff's attorney, Mr. Bochner, has been unavailable.
9 Equifax is filing this motion before receiving Mr. Bochner's response to the request for
10 stipulation because of the urgency of the matter, with the response deadline tomorrow, and the
11 last-minute, unexpected nature of this hardship.

12 6. A Declaration in Support of this Motion pursuant to Local Rule 6-3 is being filed
13 herewith.

14 Respectfully submitted, this 29th day of May, 2008.

15 NOKES & QUINN

16
17 /s/Thomas P. Quinn, Jr.

18 THOMAS P. QUINN, JR.
19 Attorneys for Defendants EQUIFAX,
20 INFORMATION SERVICES LLC
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CERTIFICATE OF SERVICE

CARVALHO v DEFENDANT EQUIFAX, et al, CASE NO: 5:08-CV-01317-JF

I, the undersigned, certify and declare that I am over the age of 18 years, employed in the County of Orange, State of California, and not a party to the above-entitled cause.

On May 29, 2008. I served a true copy of the

**MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO PLAINTIFF'S
MOTION TO REMAND; [PROPOSED] ORDER**

☐ By depositing it in the United States Mail in a sealed envelope with the postage thereon fully prepaid to the following;

☒ By ECF: On this date, I electronically filed the following document(s) with the Clerk of the Court using the CM/ECF system, which sent electronic notification of such filing to all other parties appearing on the docket sheet;

Ron Keith Bochner
Law Office of Ron Bochner
3333 Bowers Avenue, Suite 130
Santa Clara, CA 95054

Deanna L. Johnston
Kelli A. Crouch
Jones Day
555 California Street, 26th Floor
San Francisco, CA 94104-1500

Stephen Julian Newman
Brian C. Frontino
Strook & Strook
2029 Century Park East
Los Angeles, CA 90067

I hereby certify that I am employed in the office of a member of the Bar of this Court at whose direction the service was made.

I hereby certify under the penalty of perjury that the foregoing is true and correct.

/s/
YVONNE M. HOMAN